

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 16-CR-21

SAMY M. HAMZEH,

Defendant.

UNOPPOSED MOTION TO CONTINUE

Samy Hamzeh, by counsel, files this motion to continue the trial date and suspend the court's pretrial order. The defense has conferred with United States Attorney Gregory Haanstad and he has no objection to this request.

The defense reluctantly makes this request to continue the trial date. While the defense has been working hard on this case and has spent hundreds of hours drafting motions, reviewing discovery, and preparing for trial, over the past week it has become evident that issues with the Arabic translations will prevent this case from going to trial as previously scheduled. The defense was naively optimistic about how long it would take to review the government transcripts, compare them with defense translations, consult with Mr. Hamzeh and translators, and work out any differences with the government. Given the importance of the Arabic translations and what was precisely said by the informants and Hamzeh throughout this case, the defense asks that the trial be continued, that the Court's

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pretrial order be suspended, and that the January 24, 2018, final pretrial conference be converted to a status conference where a new date can be scheduled.

Dated at Milwaukee, Wisconsin this 9th day of January, 2018.

Respectfully submitted,

/s/ Craig W. Albee
Craig W. Albee, WI Bar #1015752
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